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February 15, 2011

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: EB Docket 06-36, Annual 47 C.F.R. § 64.2009(e) CPNI Certification

Annual 64.2009(e) CPNI Certification for 2011 covering the prior calendar year 2010

Date filed: February 15, 2011

Name of company covered by this certification:

Computer 5*, Inc. d/b/a LocalTel Communications

Form 499 Filer ID: **821008**

Name of signatory: John Seabeck

Title of signatory: Corp. VP and Secretary

Please find the attached annual CPNI certification of Computer 5*, Inc. d/b/a LocalTel Communications ("LocalTel") filed pursuant to Section 64.2009(e) of the Commission's rules. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules. Because some of the details included in that document could provide a roadmap for unauthorized persons to attempt to obtain CPNI, LocalTel is filing only a redacted version with the Commission's electronic filing system. *See Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information*, CC Docket No. 96-115, Report and Order and Further Notice of Proposed Rulemaking, FCC 07-22, n.167 (rel. April 2, 2007) ("We recognize carrier concerns about providing a roadmap for pretexters with this annual filing, and thus we will allow carriers to submit their certifications confidentially with the Commission."). The redacted language was previously provided to the Enforcement Bureau in Company's prior-year filing in this docket, and has not changed.

Respectfully submitted,

Paul B. Hudson

 $Counsel for \ Computer\ 5*, Inc.\ d/b/a\ Local Tel$

Communications

CERTIFICATE OF COMPLIANCE

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011 covering the prior calendar year 2010

- 1. Date filed: February 15, 2011
- 2. Name of company covered by this certification: Computer 5*, Inc. d/b/a LocalTel Communications
- 3. Form 499 Filer ID: 821008
- 4. Name of signatory: John Seabeck
- 5. Title of signatory: Corp. VP and Secretary
- 6. Certification:

I, John Seabeck, Corp. VP and Secretary of Computer 5*, Inc. d/b/a LocalTel Communications ("LocalTel") hereby certify, acting as an agent of LocalTel, that I am an officer of LocalTel and that I have personal knowledge that LocalTel has implemented established operating procedures, summarized in the attached statement, that are adequate to ensure ongoing compliance with the Commission's customer proprietary network information ("CPNI") rules set forth in Part 64, Subpart U of the Commission's rules, 47 C.F.R. §§ 64.2001 *et seq*.

Attached to this certification is an accompanying statement explaining how the LocalTel's procedures ensure that it is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in Section 64.2001 *et seq.* of the Commission's rules.

LocalTel has not received any customer complaints in the past calendar year concerning unauthorized release of CPNI, and does not have any material information with respect to the processes pretexters are using to attempt to access CPNI that is not already a part of the record in the Commission's CC Docket No. 96-115. LocalTel has therefore not taken any actions in the past calendar year against data brokers, including proceedings instituted or petitions filed by the company at either state commissions, the court system or at the Commission. LocalTel has established procedures to report any future breaches to the FBI and United States Secret Service, and it has emphasized in its employee training of the need for vigilance in identifying and reporting unusual activity in order to enable the company to continue to take reasonable measures to discover and protect against pretexting and other unauthorized access to CPNI.

I hereby represent and warrant that the above certification is consistent with Section 1.17 of the Commission's rules, 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject LocalTel to enforcement actions.

John Seabeck

Corp. VP and Secretary

Computer 5*, Inc.

Executed February <u>8</u>, 2011